

# **Exhibit B**

"Bucket 1" Cases - Filing outside the statute of repose period based on date of index surgery (CT, FL, GA, IL, IN, IA, KS, NC, OH, TN, TX, and WI)								
Case No.	Plaintiffs' Last Name	Plaintiffs' First Name	State of Surgery	Date of Surgery	Date of Case Filing	Plaintiffs' Counsel's Firm	<u>Plaintiffs' Response to Dates</u>	<u>Plaintiffs Response to Application of SOR</u>
0:16-cv-02088-JNE-DTS	Duncan	William	Tennessee	6/16/2010	6/23/2016	Skikos Crawford Skikos & Joseph	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants’ representation that the relevant index surgery will be the triggering event for Tennessee.
0:16-cv-02125-JNE-DTS	Milam	Jeffie	Tennessee	4/1/2009	6/24/2016	Kennedy Hodges, LLP	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02155-JNE-DTS	Davis	Patricia L.	Tennessee	2/23/2007	6/24/2016	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02298-JNE-DTS	Dandrea	Mario	Tennessee	2/23/2010	7/1/2016	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02386-JNE-DTS	Hall	Claudia J.	Tennessee	7/9/2009	7/11/2016	Miller Firm LLC	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02428-JNE-DTS	King Jr	Walter H	Tennessee	6/23/2008	7/15/2016	Kennedy Hodges	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02460-JNE-DTS	Scruggs	Jimmy L.	Tennessee	4/9/2010	7/19/2016	Lockridge, Grindal		Less than 10 years between index and filing.
0:16-cv-02486-JNE-DTS	Canup	Lois A.	Tennessee	2/26/2009	7/21/2016	Kennedy Hodges	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02911-JNE-DTS	Snider	Janice	Tennessee	4/26/2010	8/29/2016	Gustafson Gluek	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-00427-JNE-DTS	Roysdon	Windle R.	Tennessee	8/19/2010	2/8/2017	Murray Law Firm	Subject surgery was a revision performed on 11/11/11.	Less than 10 years between index and filing.
0:17-cv-00465-JNE-DTS	Varner	Stephen E.	Tennessee	9/8/2008	9/29/2016	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-00616-JNE-DTS	Brown	Alfred	Tennessee	12/10/2009	2/27/2017	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-01184-JNE-DTS	Enz	Martha	Illinois	7/21/2006	4/17/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)

0:17-cv-01516-JNE-DTS	Lawson	Albert	Illinois	11/11/2004	5/9/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-01617-JNE-DTS	Pilger	Catherine	Illinois	8/31/2004	5/16/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-01737-JNE-DTS	Peacock, Jr.	Claude	Ohio	9/22/2006	5/24/2017	Brown & Crouppen	Agree with dates 3M listed.	Ohio – 10 years O.R.C. § 2305.10(C)(1). Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02058-JNE-DTS	Balbach	William	Georgia	1/24/2007	6/14/2017	Pendley, Baudin	Agree with dates 3M listed.	Negligent failure to warn is a recognized exemption to the Georgia SOR; as is willful negligence, which Mr. Balback has asserted against 3M. Georgia – 10 years O.C.G.A. § 51-1-11(b)(2) Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.

0:17-cv-02270-JNE-DTS	Clinkenbeard	Philip	Kansas	7/11/2006	6/26/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02309-JNE-DTS	Smith	Barbara J.	Tennessee	3/1/2005	6/27/2017	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants’ representation that the relevant index surgery will be the triggering event for Tennessee.
0:17-cv-02386-JNE-DTS	Krippendorf	Donald	Tennessee	4/13/2011	6/29/2017	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants’ representation that the relevant index surgery will be the triggering event for Tennessee.
0:17-cv-02416-JNE-DTS	Davis	Betty	Illinois	5/23/2005	6/30/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)

0:17-cv-02490-JNE-DTS	DeMougin	Nancy A.	Indiana	2/7/2007	7/5/2017	Brown & Crouppen	Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34-20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02560-JNE-DTS	Zuniga	Vicente	Ohio	8/13/2004	7/6/2017	Brown & Crouppen	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02603-JNE-DTS	Frantz	William R	Kansas	9/19/2005	7/7/2017	Brown & Crouppen	Case was filed 12/23/2016	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02633-JNE-DTS	Davis	Kenneth	Indiana	11/7/2005	7/7/2017	Kennedy Hodges	Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34-20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02634-JNE-DTS	Harris	Wanda	Kansas	3/28/2005	7/7/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.

0:17-cv-02685-JNE-DTS	Daniels Sr	John H	Kansas	3/9/2007	7/10/2017	Brown & Crouppen	Subject surgery was 3/28/07	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02733-JNE-DTS	Wilkins	Roy	North Carolina	1/1/2004	7/11/2017	Brown & Crouppen	Subject surgery was 6/23/2009; case was filed 12/23/2016	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:17-cv-02760-JNE-DTS	Green	Irma	Georgia	7/18/2005	7/11/2017	The Olinde Firm, LLC	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-02792-JNE-DTS	Sons	Mary	Indiana	12/28/2005	7/12/2017	Brown & Crouppen	Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34-20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”

0:17-cv-02827-JNE-DTS	Hamilton	Danny	Ohio	3/11/2005	7/12/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02828-JNE-DTS	Wilson	Tom	Indiana	8/24/2005	7/12/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34-20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-02845-JNE-DTS	Weeks	Sheryl	Kansas	4/11/2007	7/13/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02846-JNE-DTS	Task	William	Kansas	1/10/2006	7/13/2017	Brown & Crouppen	agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02942-JNE-DTS	Harp	John W	Kansas	11/17/2003	7/14/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.

0:17-cv-02950-JNE-DTS	Hipp	Donald	Ohio	1/1/2004	7/14/2017	Kennedy Hodges, L.L.P.		Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”  Date of surgery should be 7/9/04
0:17-cv-02970-JNE-DTS	Moore	Howard	North Carolina	1/1/2006	7/16/2017	Brown & Crouppen		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.  Date of surgery should be 10/9/2006; case was filed 12/1/2016
0:17-cv-02984-JNE-DTS	Campbell	Kenneth	North Carolina	12/6/2005	7/17/2017	Brown & Crouppen		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.  Agree with dates 3M listed.
0:17-cv-02992-JNE-DTS	Luttrell	Ricky E.	Ohio	10/11/2006	7/17/2017	Kennedy Hodges, L.L.P.		Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”  Agree with dates 3M listed.



0:17-cv-02996-JNE-DTS	Thompson	Billie	Ohio	8/3/2005	7/17/2017	Kennedy Hodges	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-03117-JNE-DTS	Henry	Theodore L	Illinois	2/12/2007	7/19/2017	Brown & Crouppen	Case was filed 12/13/2016	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-03214-JNE-DTS	Johnson	Darline M	Illinois	6/16/2005	7/21/2017	Brown & Crouppen	Case was filed 12/13/2016	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-03314-JNE-DTS	Johnson	Darren V.	Georgia	1/23/2006	7/25/2017	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.

0:17-cv-03412-JNE-DTS	Quesinberry	Geraldine	Georgia	7/19/2005	7/27/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-03646-JNE-DTS	Benjamin	John R.	Georgia	11/13/2006	8/9/2017	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-03993-JNE-DTS	Hughes	Clifford	Illinois	4/7/2006	8/28/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-04014-JNE-DTS	Haynes	Josephine	Ohio	5/24/2007	8/29/2017	Brown & Crouppen	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”

0:17-cv-04088-JNE-DTS	Harris	Lawrence	Ohio	6/18/2007	8/31/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-04104-JNE-DTS	Trice	Johnny	Ohio	4/1/2004	9/1/2017	Kennedy Hodges	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-04162-JNE-DTS	Harrington	Elizabeth	Connecticut	7/20/2004	9/7/2017	Brown & Crouppen	Subject surgery was 12/6/2005	Plaintiff in the process of trying to dismiss this case.
0:17-cv-04231-JNE-DTS	Elbert	Diane	Indiana	8/2/2006	9/13/2017	Brown & Crouppen	Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34-20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-04252-JNE-DTS	Kenny	Charles	Illinois	7/19/2007	9/14/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)

0:17-cv-04302-JNE-DTS	Tilley	William	North Carolina	2/23/2005	9/19/2017	The Olinde Firm, LLC	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:17-cv-04313-JNE-DTS	Janet L.	McNease	Tennessee	8/22/2011	9/19/2017	Kirtland Packard	agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-04394-JNE-DTS	Bigsby-Fritz	Debra	Tennessee	3/10/2011	9/26/2017	Skikos Crawford	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-04413-JNE-DTS	Kasson	Julie	Kansas	3/19/2007	9/27/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-04469-JNE-DTS	Swanson	Colleen	Illinois	4/10/2007	9/28/2017	Seth Webb	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-04484-JNE-DTS	White	Bessie L.	Illinois	7/14/2005	9/29/2017	Davis Crump	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-04653-JNE-DTS	Pepke	Russell	Ohio	8/29/2006	10/12/2017	Kennedy Hodges	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”

0:17-cv-04733-JNE-DTS	Gardner	Vinna M.	Ohio	12/1/2005	10/19/2017	Brown & Crouppen	Subject surgery was 12/20/2005	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-04750-JNE-DTS	Babb	Douglas	Georgia	7/5/2006	10/20/2017	Davis Crump	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-04845-JNE-DTS	Murray	Danny	Tennessee	7/15/2011	10/25/2017	Kirtland Packard	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-04904-JNE-DTS	Luketich	Richard	Illinois	1/10/2007	10/27/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:17-cv-04999-JNE-DTS	Carpenter	Willie	Tennessee	7/31/2008	11/2/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Less than 10 years between index and filing.

0:17-cv-05381-JNE-DTS	Bentson	Gary R.	Georgia	3/9/2005	12/7/2017	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-05497-JNE-DTS	Conner	Marty	Ohio	5/30/2007	12/20/2017	Davis Crump, P.C	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:17-cv-05531-JNE-DTS	Morris	Larry	Kansas	7/27/2007	12/21/2017	Kennedy Hodges	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:18-cv-00049-JNE-DTS	Rommer	Robert	Georgia	11/12/2007	1/5/2018	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.

0:18-cv-00093-JNE-DTS	Ashley	Gearold Ruth	Ohio	7/18/2005	1/12/2018	Bernstein Liebhard LLP	agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. “However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues.”
0:18-cv-00151-JNE-DTS	Russell	Janice	Illinois	2/15/2005	1/22/2018	Bernstein Liebhard LLP	Agree with dates 3M listed.	SOR unconstitutional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (Ill. 1997)
0:18-cv-01117-JNE-DTS	Tisdale	Ruth B.	North Carolina	5/6/2002	4/25/2018	Justinian & Associates	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-01614-JNE-DTS	Fitton	Irma	North Carolina	9/27/2007	6/9/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.

0:18-cv-01774-JNE-DTS	Carpenter	Daisy	North Carolina	6/8/2009	6/28/2018	Brown & Crouppen	BH exposure with infections following surgeries on 6/8/09 and 10/17/11	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-01887-JNE-DTS	Woody	Richard	North Carolina	4/10/2007	7/6/2018	Kennedy Hodges	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-01918-JNE-DTS	Davis	Karen	North Carolina	5/5/2009	7/9/2018	Brown & Crouppen	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.



0:18-cv-01950-JNE-DTS	Payne	Ernest	North Carolina	7/28/2009	7/12/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-01999-JNE-DTS	Hobbins	Lisa	North Carolina	6/23/2006	7/16/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-02010-JNE-DTS	Barham	Phyllis	North Carolina	3/8/2007	7/17/2018	Brown & Crouppen	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.

0:18-cv-02118-JNE-DTS	Yelverton	Annie W.	North Carolina	1/23/2009	7/24/2018	The Miller Firm LLC	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-02179-JNE-DTS	Yankovich	Brian	North Carolina	6/1/2009	7/26/2018	Kennedy Hodges	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-02186-JNE-DTS	Morrison	Richard	North Carolina	7/26/2005	7/26/2018	Brown & Crouppen	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.

0:18-cv-02215-JNE-DTS	Whitfield	John	North Carolina	1/13/2009	7/30/2018	Kennedy Hodges	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-02306-JNE-DTS	James	Linda	North Carolina	2/22/2005	8/7/2018	Kennedy Hodges	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.
0:18-cv-02307-JNE-DTS	King	Terry	Kansas	3/11/2008	8/7/2018	Kennedy Hodges	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60-513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:18-cv-02391-JNE-DTS	Vonville	Natalie	North Carolina	8/26/2009	8/15/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.

0:18-cv-02750-JNE-DTS	Hicks	Mildora	Tennessee	5/31/2012	9/25/2018	Gustafson Gluek PLLC	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants’ representation that the relevant index surgery will be the triggering event for Tennessee.
0:18-cv-03372-JNE-DTS	Whitaker	Melisa	Tennessee	8/22/2012	12/12/2018	Skikos Crawford Skikos & Joseph	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants’ representation that the relevant index surgery will be the triggering event for Tennessee.
0:18-cv-03384-JNE-DTS	Hawkins	Deana	North Carolina	7/28/2008	12/12/2018	Justinian & Associates PLLC	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants’ representation the ‘date of initial purchase’ will be any given plaintiff’s index surgery.